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FILED

April 7, 1998

Ms. Magalie R. Salas, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**RECEIVED**

APR - 7 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**EX PARTE: Customer Proprietary Network Information**  
**CC Docket Nos. 96-115 and 96-149**

Dear Ms. Salas:

Today, representatives of GTE Wireless and GTE Service Corporation met with Dorothy Attwood of the General Counsel's Office, Jeannine Poltronieri and Todd Slamowitz of the Wireless Bureau and with Lisa Choi and Jeannie Su of the Common Carrier Bureau to discuss GTE's questions and concerns regarding certain aspects of the Commission's recent order in the above-captioned proceedings. GTE discussed the issues contained in the attached presentation.

Please incorporate this information into the record of the above-captioned proceeding. In accordance with Section 1.1206(b)(1) of the Commission's Rules, two copies of this notice are being filed with the Secretary of the FCC.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney Hatch", with a long horizontal flourish extending to the right.

Whitney Hatch

Attachment

c: D. Attwood  
L. Choi  
J. Poltronieri  
T. Slamowitz  
J. Su



# **Customer Proprietary Network Information**

CC Docket No. 96-115

CC Docket No. 96-149

April 7, 1998

# CPNI RULES

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- **Total Service**

- Sets parameters for implied approval
- Scope set at existing customer-carrier relationship

- **Approval**

- Notification
- Consent

# Impact of CPNI Rules

## CPE

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- CMRS CPE bundling puts wireless carriers in unique position
- Permitting carriers to use CPNI to market CPE promotes the public interest in:
  - ➔ Efficient Spectrum Usage
  - ➔ New Services and Features
  - ➔ Quality Service
  - ➔ Customer Satisfaction
  - ➔ Public Safety

# Impact of CPNI Rules Information Services

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- Historically bundled with wireless digital service
- Customer confusion and irritation with carrier inability to market effectively the logical components of service
- Ensures that digital service providers and PCS lack parity with analog systems
- Given battery life considerations, benefits customers who are high volume users, especially those with many incoming calls

# **Impact Of CPNI Rules**

## **Customer Retention/Win-Back**

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- “Customer retention” encompasses virtually every point of contact with the customer
- Not clear when customer retention ends and win-back begins
- Win-back restriction:
  - ➔ Unless unreasonable, bad public policy because it deters competition
  - ➔ Is not clear for wireless industry:
    - Pre-paid

# Impact of CPNI Rules

## Consent/Notification

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- **Consent**
  - ➔ Preexisting consent must be valid
  - ➔ No need for approval for use of CPNI for in-bound telemarketing to be subject to the same restrictions as out-bound marketing
- **Notification**
  - ➔ Expansive requirements severely hamper carriers' ability to obtain consent
  - ➔ Should not apply to in-bound telemarketing
  - ➔ Is notification one-time or every time